

ARTxLAW

2023-07-07

Ronald Adelman
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Hon. Andrew L. Carter, Jr.
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: ADN Jeans Group LLC v. Mundi Trade, Inc., 23-cv-2862 (ALC)

Dear Judge Carter:

I respectfully submit this Letter Motion to withdraw personally as counsel of record for Plaintiff ADN Jeans Group LLC ("Plaintiff") in this action in favor of another attorney to be appointed by Stropheus LLC ("Stropheus"). Stropheus is my former employer and the firm that, as far as I am aware, will continue to represent the Plaintiff in this action.

On or about April 6, 2023, Stropheus, acting through me, first appeared as counsel for the Plaintiff by filing the Complaint and other Case Opening documents. At all times relevant to this motion through June 1, 2023, I was employed by Stropheus as an attorney on an at-will basis. On or about May 29, 2023, I informed Stropheus's principal attorney ("Stropheus's Principal") (*i.e.*, my now-former employer) (copied by email on this Letter Motion) that I was leaving Stropheus to work for my new and now current firm: ARTxLAW PLLC. At his request, I agreed to a four-week transition period to permit a new or existing Stropheus attorney to replace me.

As of the date of this letter, I am unaware of any such person having been identified, let alone having actually appeared. Although I expect that Stropheus will have a new attorney appear in a matter of weeks, the fact that it has not yet done so unfortunately has necessitated this motion.

It bears emphasis that the Plaintiff did not engage me personally. It engaged Stropheus, and Stropheus's Principal assigned me to the case. As noted, Stropheus will continue to represent the Plaintiff as far as I know. However, since I no longer work for Stropheus, the counsel of record cannot be me.

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I have reviewed CPLR 321 and the rules of this Court, as well as the cases applying those rules, and could not find any similar circumstances: i.e., the failure of a law firm that is continuing to represent a client in a court case to replace an attorney who has left the firm. Attorneys leave firms routinely, and firms continue their representation of clients while replacing the leaving attorneys just as routinely. I expect that Stropheus will do the same. However, the delay in this case has made this motion necessary.

In order to protect Plaintiff's interests during this transition period, I respectfully request on Plaintiff's behalf that all pending deadlines be adjourned by the sooner of four weeks, or until a new attorney for Stropheus appears.

Respectfully,

Ronald Adelman

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cc: Christian Jensen, Esq. (via ECF)
Richard Lehun, Esq. (by email at Richard.Lehun@stropheus.com)